

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

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MDL No. 2323  
Case No. 18-md-2323-AB

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and others  
similarly situated,*

Civil Action No. 14-cv-00029-AB

Plaintiffs,

v.

National Football League and NFL  
Properties LLC, successor-in-interest  
to NFL Properties, Inc.

Defendants.

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THIS DOCUMENT RELATES TO:

ALL ACTIONS

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**ZIMMERMAN REED LLP'S NOTICE OF INTENT TO ARGUE**

Pursuant to the Court's May 7, 2018 Revised Order, undersigned counsel for  
Zimmerman Reed LLP hereby gives notice of its intent to argue at the May 15, 2018  
hearing on the allocation of common benefit fees.

During its presentation, Zimmerman Reed will refer to the following motions,  
memorandums, and declarations:

1. Co-Lead Class Counsels' Petition for an Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of a Set-Aside of Five Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives, Feb. 13, 2017, ECF 7151.

2. Declaration of Christopher A. Seeger In Support of Proposed Allocation of Common Benefit Attorneys' Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives, Oct. 10, 2017, ECF 8447.

3. Counter-Declaration of Charles S. Zimmerman in Response to Proposed Allocation of Common Benefit Attorneys' Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives, Oct. 27, 2017, ECF 8722.

4. Omnibus Reply Declaration of Christopher A. Seeger as to Responses, Objections and Counter-Declarations to Proposed Allocation of Common Benefit Attorneys' Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards of Class Representatives, Nov. 17, 2017, ECF 8934.

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Dated: May 11, 2018

Respectfully submitted,

ZIMMERMAN REED LLP

s/ J. Gordon Rudd, Jr.

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of Zimmerman Reed LLP's Notice of Intent to Argue was filed electronically with the Clerk of Court using the CM/ECF System on May 11, 2018. The CM/ECF System will serve all counsel of record.

Dated: May 11, 2018

ZIMMERMAN REED LLP

s/ J. Gordon Rudd, Jr.

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